

EXHIBIT A

CARMELO MILLAN

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CARMELO MILLAN, individually, : CIVIL ACTION
and on Behalf of All Other :
Persons Similarly Situated :
Plaintiffs :
: :
: :
vs. :
: :
: :
: :
CITIGROUP, INC., :
CITIGROUP TECHNOLOGY, INC. :
Defendants : NO. 07-CIV-3769

Wednesday, January 16, 2008

Deposition of CARMELO MILLAN, taken pursuant to
notice at the law office of Morgan, Lewis & Bockius,
LLP, 101 Park Avenue, New York, New York, on the above
date, beginning at approximately 10:00 a.m., before
Charles P. Carmody, Registered Professional Reporter
and Notary Public.

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1 Q. 388 Greenwich Street?

2 A. Yes.

3 Q. That's in New York City?

4 A. Yes. It's downtown Manhattan. Tribeca.

5 Q. At the time of your resignation, where did
6 you work?

7 A. Warren, New Jersey.

8 Q. When did you start working in Warren, New
9 Jersey?

10 A. I think about 2005.

11 Q. Did you work in Warren through your
12 resignation in 2007?

13 A. Yes, I did.

14 Q. Who is Meredith Prange, P-R-A-N-G-E?

15 A. Meredith Prange, she was the managing
16 director for global engineering.

17 Q. What were her responsibilities, if you know?

18 A. She essentially was in charge of the global
19 engineering department.

20 Q. What was the global engineering department?

21 A. The global engineering department was the
22 department that created standards for Citigroup --
23 technology standards to Citigroup.

24 Q. Was that part of CTI?

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1 A. Yeah, I assume so.

2 Q. Did she have any day-to-day supervision over
3 you?

4 A. Not directly, no.

5 Q. Would she have knowledge of your job duties?

6 A. I would assume so, yeah.

7 Q. Why would you assume so?

8 A. Because I worked for her for -- I mean, the
9 lab was a large part of what global engineering did.
10 So she was aware of the fact that I was in the lab
11 supporting it.

12 Q. When you say, "the lab," do you mean the lab
13 in Warren, New Jersey?

14 A. No, the lab -- I mean -- I'm referring to the
15 lab as an entity, right. Like essentially what was
16 used to form the evaluations that global engineering
17 did, right.

18 So there was various lab facilities.
19 Initially, I started working out of 388 Greenwich, and
20 then eventually moved in to Warren.

21 Q. When did you start working at 388 Greenwich.

22 A. I think around 2005 -- no, I think it was
23 actually earlier than 2005. Probably 2003, probably.

24 Q. 2003?

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1 BY MS. BOUCHARD:

2 Q. Is everything in your resume, true and
3 correct?

4 A. For the most part.

5 Q. What isn't true and correct?

6 A. I mean, the resume should accurately reflect
7 -- dates might be off by a month or two. I mean, as
8 far as recollection, it sounds great.

9 Q. So other than dates being off perhaps by a
10 month or two, are there any material errors in your
11 resume, that you're aware of?

12 A. What do you mean by material errors?

13 Q. I guess it's true and correct to the best of
14 your knowledge?

15 A. Yes.

16 Q. You prepared it?

17 A. Yeah.

18 Q. When did you prepare it?

19 A. Recently, I've been seeking employment. So I
20 was -- actually when I left Citigroup, I was trying to
21 be self employed and incorporate myself.

22 In the meantime, recently I've decided to
23 begin to look for work outside of that. So I've been
24 working on my resume. It's been an ongoing thing.

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1 A. Yeah.

2 In which case, he was not a team lead.

3 Q. He was not a team lead?

4 A. No.

5 Q. So he may have some knowledge, but not what I
6 would call the most day-to-day knowledge?

7 A. No.

8 Q. Now, let's go to Richard Braunagel.

9 A. Yes.

10 Q. Who is he?

11 A. He was my initial day-to-day manager at
12 Citigroup.

13 Q. What about Thomas Saranello?

14 A. He was one of my day-to-day managers at
15 Citigroup as well, routinely.

16 Q. Paul Holder?

17 A. Paul Holder was my day-to-day manager when I
18 was in global engineering.

19 Q. What about Naseer Ibrahim?

20 Is that how you say his name?

21 A. Yes.

22 He was my coworker in the lab.

23 Q. When you say, the lab, do you mean at
24 Greenwich Street, or do you mean at Warren, New Jersey?

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1 of the question.

2 Go ahead. You can answer.

3 THE WITNESS: What do you mean by
4 the integration of the lab?

5 BY MS. BOUCHARD:

6 Q. We'll go through your job descriptions in a
7 little bit.

8 But would you say that at all times that he
9 had the same job duties as you?

10 MS. WALSH: At all times?

11 BY MS. BOUCHARD:

12 Q. At all times when he was your coworker.

13 A. We were both essentially responsible in
14 support of the lab, yeah. That was our responsibility.

15 Q. I'll ask you some further questions about
16 that a little later.

17 Then in your interrogatories, you referenced
18 various telecom analysts?

19 A. Correct.

20 Q. What's a telecom analyst?

21 A. I think a better title would be a network
22 support person, because that's essentially what he did.

23 We were responsible for the cable plants, all
24 the cabling, all the computer cabling within a given

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1 Citigroup site that we were given to support.

2 So if a person had an issue with a network
3 connection and getting connectivity to the corporate
4 network or the company network, we would go there and
5 troubleshoot.

6 I mean, essentially, we'd use two primary
7 systems, a trouble ticketing system and a customer
8 service request system, which was proprietary to
9 Citigroup to receive direction on the work we were
10 performing.

11 Q. How would you get the trouble ticket?

12 Where would that come from?

13 A. The trouble tickets were received -- there
14 was various systems over the years. I mean,
15 essentially they all worked the same way.

16 You were assigned a queue -- depending on the
17 side that you worked on, you were assigned to a queue.
18 People would submit tickets to the help desk, support
19 tickets to the help desk.

20 The help desk tickets would then based on
21 location and source of the problem, be routed to the
22 appropriate support personnel.

23 Q. So you wouldn't take the intake call in the
24 first instance, right?

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1 **A.** **Correct.**

2 **Q.** **Why were you coming in late and leaving**
3 **early?**

4 **A.** **Essentially, first --**

5 MS. WALSH: Objection to the form.
6 Foundation.

7 THE WITNESS: First and foremost, I
8 mean, at the time I signed this I was really
9 contemplating leaving Citigroup, right.

10 This is 9/6/06. I was leaving Citigroup
11 by March -- I left Citigroup in March of '07.

12 We had hired -- they had hired two
13 consultants on, right. They were supposed to
14 keep them on for six months. Make them permanent
15 employees. They never did.

16 The validity of this really to me, and
17 the question at the time, I just received it and
18 pretty much signed it because I was stressed out
19 from the workload and the lack of fulfilled
20 promises that I had received while I was at
21 Citigroup.

22 I mean, I was on -- I received this in
23 '06. I was with global engineering since like
24 '03.

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1 And from the time I took the position, I
2 told them that in order for the actual job they
3 had envisioned to be possible, right, for it to
4 be a steppingstone into global engineering, and
5 into engineering responsibilities as opposed to
6 day-to-day, like, racking, stacking, and cabling
7 responsibilities, right, that they would need
8 more people to do it.

9 I mean, on the production side of the
10 company, essentially, like the business critical,
11 on the business side of the company, the
12 income-producing side of the company, right,
13 similar jobs in similar facilities, right, were
14 staffed by more people. So by telecommunications
15 analysts, not network engineers, right.

16 And like a facility the size of the
17 Warren facility, right, would typically be
18 staffed and really wasn't even telecommunications
19 analysts, you know, it's what Citigroup referred
20 to them as.

21 Really, what they were, were rack and
22 stack technicians and network support technicians
23 is what the industry would refer to them as.

24 BY MS. BOUCHARD:

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1 Q. Mr. Millan, I'm going to get into your job
2 duties in more detail --

3 MS. WALSH: Do you want to let him
4 answer the question or --

5 MS. BOUCHARD: Well, he really
6 isn't answering the question.

7 BY MS. BOUCHARD:

8 Q. What I want to know is why you were late and
9 left early.

10 MS. WALSH; Yes, he's answering the
11 question. It's not a simple yes/no.

12 Are you answering that question?

13 THE WITNESS: Yes, I'm answering
14 the question.

15 BY MS. BOUCHARD:

16 Q. So you were stressed out --

17 MS. WALSH: Are you finished
18 answering the question?

19 BY MS. BOUCHARD:

20 Q. -- because you were --

21 MS. WALSH: Can you let him finish
22 answering the question? He's not done.

23 MS. BOUCHARD: I'll let him finish.

24 BY MS. BOUCHARD:

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1 Q. So you were stressed out because you were
2 understaffed?

3 A. Essentially. And because the position had
4 never really turned into what they had offered me,
5 right.

6 Like what they had offered me, was a position
7 that I believe, if I'm not mistaken, that you have a
8 job description of what they had actually offered me,
9 right.

10 What it ended up being was what they
11 advertised when I left the company, right. Which was
12 more of an operational position as opposed to like a
13 steppingstone into engineering.

14 And I had had conversations with Amedeo about
15 staffing and, you know, essentially at that point I
16 felt abused, really, by the company.

17 Q. Can you turn to your resume, please?

18 A. That's fine.

19 Q. Let's turn to the second page.

20 I know you're not going to be able to give me
21 exact dates and times when you did this, but I want to
22 go through 1/3 through 3/7 that you listed here for
23 your job duties, and ask you when in time you did these
24 job duties, okay?

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1 When did you participate in the build-out and
2 daily operations in the first bullet point?

3 A. There in the Warren migration.

4 Q. The Warren migration?

5 A. Yes.

6 Q. When did that occur?

7 A. I'm assuming -- I believe we started to
8 prepare for it like a year prior to the date that we
9 moved in.

10 Q. So you moved in 2005?

11 A. Yeah.

12 Q. So you started the build-out process in 2004?

13 A. No. They made us aware that we were moving
14 in 2005. I wouldn't be able to tell you exact dates,
15 but we were made aware that we would be moving to
16 Warren.

17 We started collecting information, right, in
18 regards to the lab and the assets that we needed to
19 move, so on and so forth, which was my primary input
20 into it, right, what we needed to move, capacity based
21 on what we had.

22 So essentially I was helping to collect
23 information based on the stuff that I was already
24 supporting within the lab, right.

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1 A. I think there was like three or 400 engineers
2 within, but not all three or 400 engineers were in the
3 lab at any given time.

4 I mean, they would come to us with a
5 requirement that they had for testing an implementation
6 plan, and we would receive the equipment and set it up
7 as they directed, right, based on their testing
8 requirements.

9 And if they needed help from somebody else
10 and weren't familiar -- I mean, there was 400
11 employees. They all didn't necessarily know each
12 other.

13 We were the central point in the lab taking
14 and processing requests, right. So we would tell them
15 who the proper people to deal with would be.

16 Q. Did you ever help them troubleshoot?

17 A. Yeah, we provided all of the network support
18 for the lab.

19 Q. So you weren't just taking direction, you
20 were helping them solve problems, correct?

21 MS. WALSH: Objection to the form.

22 THE WITNESS: I was providing
23 technology support, yes. I was helping them
24 solve problems.

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1 BY MS. BOUCHARD:

2 Q. You say in your resume, you configured,
3 maintained, documented and supported development
4 network.

5 What does that mean?

6 A. The lab network when we moved to Warren -- I
7 took on a lot of responsibilities besides my primary
8 responsibility of supporting the lab in Warren, right.

9 Q. That's what I was getting at with respect to
10 Naseer --

11 MS. WALSH: Hold on. He's not
12 done.

13 Let him finish answering the question
14 before you come in with another question.

15 MS. BOUCHARD: All right. Okay.

16 BY MS. BOUCHARD:

17 Q. Go ahead. Why don't you explain those
18 additional responsibilities.

19 A. That's not what I was doing.

20 I mean, you made me lose my train of thought.

21 Q. Okay. Go ahead.

22 A. Essentially, what was your question prior to
23 that.

24 MS. WALSH: Do you want to have the

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1 court reporter read it back?

2 MS. BOUCHARD: No. I'm going to
3 ask a different question.

4 BY MS. BOUCHARD:

5 Q. I had asked you from your resume, you said
6 that you configured, maintained, documented and
7 supported development network.

8 A. All right. When we were moving to Warren,
9 essentially we were responsible for maintaining the lab
10 network, right.

11 The lab network was essentially the
12 development network, right. So when we moved to
13 Warren, it was deemed that we would have a general lab
14 network that would be considered the primary network
15 for the lab and would not be used for testing purposes,
16 right.

17 Paul Holder engineered the network, gave me
18 the specs and the configurations for this network,
19 right.

20 We got together, placed the orders for the
21 equipment, installed the equipment. He gave me all the
22 configurations for the equipment.

23 I got the configurations on the equipment,
24 interconnected it, and made sure it came up from a

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1 connectivity standpoint -- from a network standpoint.

2 Q. So you got an initial design, but then you
3 planned the physical layout.

4 Is that a good way to put it?

5 MS. WALSH: Objection to the form
6 of the question.

7 THE WITNESS: No. I received the
8 design and configurations for the network, right.
9 And I just made sure that they were put on the
10 equipment.

11 BY MS. BOUCHARD:

12 Q. So it was per spec.

13 Is that what you're saying?

14 A. I don't recall, really, if there was issues
15 for him.

16 Q. Did you provide Paul any input in that
17 process?

18 A. Port capacity. So what we needed based on
19 the amount of equipment that we had, and we were moving
20 to Warren, more or less, the amount of network ports we
21 would need to house that.

22 Actually, in addition to that as well, the
23 different groups that were supported within the lab
24 were actually accounted for as well.

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1 So like the port capacity per group, that's
2 it.

3 (Whereupon, a discussion was held
4 off the record.)

5 (Whereupon, Exhibit Millan-3 was
6 marked for identification.)

7 BY MS. BOUCHARD:

8 Q. What's been marked as Millan-3 is your
9 performance evaluation for the period of July 1st,
10 2004, through December 31st, 2004.

11 Do you see that?

12 A. Yeah.

13 Q. Are you familiar with this document, or do
14 you need to read it?

15 A. I'll go through it.

16 Q. Okay.

17 (Whereupon, a discussion was held
18 off the record.)

19 BY MS. BOUCHARD:

20 Q. Looking at the first page, Section 1, "Key
21 Job Responsibilities," were those your key job
22 responsibilities?

23 A. The wording might be misleading, right. Let
24 me read them though.

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1 the 388 Greenwich facility that I supported,
2 right. Those computers needed to move from 388
3 Greenwich to the Warren lab facility, right.

4 In order for them to move to the Warren
5 lab facility, right, they needed input as far as
6 what type of cabling would be necessary, what
7 type of facilities would be necessary, the amount
8 of cabinets that were necessary, based on our
9 existing setup, right.

10 So I assisted in collecting information,
11 right, and provided this information to the
12 appropriate people.

13 There were teams of people working on
14 these projects, right. There was various labs.
15 If I'm not mistaken, they were building out 18
16 labs within the Warren facility, right.

17 So the equipment that I supported needed
18 to get to Warren, right. Global engineering,
19 right, wasn't -- the project for whatever reason,
20 was really -- I didn't have enough experience at
21 the time, right, to determine exactly what was
22 going on.

23 I was taking direction from Paul, Amedeo,
24 Yesim Akdeniz, as far as what I needed to be

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1 doing.

2 So I was doing my support
3 responsibilities. And then on top of it they
4 were like, look, we need to move the lab to
5 Warren, right. So, you know, help us, you know,
6 gauge what needs to happen to make that occur,
7 right.

8 It wasn't my primary job responsibility,
9 I wouldn't say, right, because my primary job
10 responsibilities and my reviews were based on the
11 lab being up and functioning.

12 If I walked in on any given date and the
13 lab was down, right, from a connectivity -- a
14 network connectivity standpoint, or the requests
15 that were taking place in the lab weren't being
16 processed and equipment wasn't getting installed,
17 right, that was my primary evaluation.

18 That's what I was primarily held to in
19 addition to all these other, like, information
20 gathering exercises that I performed, right, and
21 helping them gauge what they needed within the
22 facility at Warren, right. That's what this is
23 relevant to.

24 So essentially we had a lab in 388

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1 Greenwich. The lab needed to move to Warren. I
2 supported the lab, right. The lab wasn't going
3 to move if I didn't help them do it, right. And
4 they asked me to assist them in it.

5 BY MS. BOUCHARD:

6 Q. Did Naseer have the same responsibilities
7 with respect to the build-out of the Warren lab
8 facility?

9 A. He helped in the information gathering
10 process. He helped to stage the equipment prepare
11 sheets, gather information, yeah.

12 Q. At some point did you have a dispute with
13 Naseer?

14 A. Yeah. I don't think it's relevant to this,
15 but, I mean, what would you like to know about it?

16 Q. What was your dispute with Naseer?

17 A. Essentially, me and Naseer were coworkers.
18 And Naseer tended to go on vacation, takes days off,
19 and do other things that would affect my workload
20 within the lab.

21 So being that there was only two technicians
22 within the lab that were supporting lab requests and
23 supporting the lab in general --

24 Q. You and Naseer?

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1 actually ended up transferring. But then even before
2 the transfer, he was sitting here in New York.

3 Amedeo sat upstairs on the fourth floor. The
4 lab facility was on the first floor. Naseer sat
5 upstairs on the fourth floor.

6 But they didn't see it due to physical
7 proximity, they didn't see it just because they were
8 not performing the work, right, they weren't performing
9 the support work.

10 So they weren't aware of what the nature of
11 the issue was, right.

12 Q. You said that Amedeo was on the fourth floor?

13 A. Correct.

14 Q. You were on the first floor?

15 A. Correct.

16 Q. Did you have a set desk or cube?

17 A. We had cubes on the fourth floor. And then
18 there was a lab facility where we performed the
19 majority of our work and really was where we should be.

20 Throughout our career there, there was like
21 an ongoing question as to whether we should even have
22 cubicles, right.

23 When we were at 388 Greenwich, they were
24 trying to get rid of our cubicles because the vast

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1 majority of our time was spent in the lab supporting
2 it.

3 Q. Did you have a computer?

4 A. Yes.

5 Q. E-mail?

6 A. Yeah.

7 Q. Phone?

8 A. Yes.

9 Q. I understand that you have some Cisco
10 certifications?

11 A. They're not currently active.

12 I had a Cisco and CCNA.

13 Q. What's involved with a CCNA?

14 A. A Cisco CCNA is essentially a general
15 networking certification for Cisco equipment. They
16 familiarize you with Cisco IOS, which is the operating
17 system for Cisco equipment, right.

18 And basically, they give you like an overall
19 understanding of network technologies as they relate to
20 Cisco equipment.

21 Q. Did you have that since 2001?

22 A. Yeah. I got it my first year, if I'm not
23 mistaken, when I was with Citigroup.

24 It was a self -- essentially, it was a self

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1 MS. WALSH: 2001.

2 THE WITNESS: Oh, 2001. We were
3 responsible for different areas of the building.
4 But, I mean, essentially whoever got to the
5 ticket first did it, whoever was available.

6 Because we had customer service requests
7 and trouble tickets, right. So if someone is --
8 if everybody is working on the trouble tickets --
9 I mean on the customer service requests and a
10 trouble ticket comes in, whoever was available
11 would handle it.

12 BY MS. BOUCHARD:

13 **Q. What types of trouble tickets would you get?**
14 **What are typical scenarios?**

15 MS. WALSH: Again, this is all
16 relating back to 2001?

17 MS. BOUCHARD: Yes.

18 THE WITNESS: Network support
19 tickets. Typically people -- we would go and
20 test the person's connection at their desk
21 location and find out what network they were on.

22 Make sure the connection was working
23 properly.

24 BY MS. BOUCHARD:

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1 Q. Okay. Go ahead.

2 What were those three main tasks?

3 A. All right. Essentially, we would receive
4 trouble tickets. We work on customer service requests
5 that were also on the system.

6 And then beyond that, we would have things
7 that would come up similar to this like 388 lab if they
8 were remodeling a floor or something.

9 At which case Tommy, our team lead, would
10 meet with the appropriate personnel, right. Depending
11 on where it was located in the building, he would hand
12 it off to a technician. And the technician would
13 assist in the cabling of that particular floor, right.

14 So the lab build-out was essentially like
15 providing X amount of network connections and making --
16 testing them and making sure that they're on the
17 network for the lab to work.

18 Q. Now, why couldn't an electrician just do
19 that?

20 A. Because the cable plant for the building,
21 right, the cabling for the building, there was specific
22 components that if you disconnected a cable on the
23 seventh floor, right, the 35th floor might get
24 disconnected.

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1 And we support a network connectivity for the
2 entire building, right. So since we support a network
3 connectivity for the entire building, we were expected
4 to document it.

5 So if we had an electrician in there and he
6 didn't know where a cable was or he cut something or he
7 wasn't familiar with something, right, or he installed
8 something and didn't document it properly, now when it
9 comes back -- when it comes time to troubleshoot a
10 network connectivity issue, right, you can't do it
11 efficiently because you don't have the documentation,
12 right.

13 So it was deemed that central groups would
14 handle network support from a cabling perspective for
15 entire sites, right. And that's pretty much what we
16 did.

17 Q. Now, I think you said that there was a third
18 core function?

19 A. I just mentioned all three.

20 Q. Did you?

21 A. Yeah.

22 Q. So it was the trouble ticketing, the lab
23 build-out, and -- I'm sorry, I missed the third.

24 What was the third one again?

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1 MS. WALSH: Customer service.

2 THE WITNESS: Customer service,
3 plus trouble ticketing, and like projects that
4 might not necessarily fall within the scope --
5 the customer service request system in Citigroup
6 didn't necessarily -- it was like down to like
7 one user.

8 So if you needed a couple of hundred
9 connections installed on a given floor, like they
10 might submit a blanket CSR.

11 Like, there was really not necessarily a
12 work flow around it. Tommy would deal with those
13 type of requests. And then he would delegate
14 them appropriately.

15 BY MS. BOUCHARD:

16 Q. Is that a restack, or is that something
17 different?

18 A. A restack would have been considered a
19 project as well.

20 Q. Why was your knowledge of networking a help
21 in this group?

22 MS. WALSH: Objection to the form
23 of the question.

24 THE WITNESS: Why was my knowledge

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1 of networking --

2 MS. WALSH: Which group are you
3 referring to?

4 MS. BOUCHARD: Well, I'm still on
5 the 2003 review.

6 MS. WALSH: Okay.

7 BY MS. BOUCHARD:

8 Q. At least Tom, your manager, thought that your
9 knowledge of networking and initiative to address all
10 compliance issues was a major part of the success.

11 A. It might have been a help from the standpoint
12 that -- I mean, really I can't tell you particularly
13 what he meant by that statement, right, but we did have
14 to, like, set port speeds on switches and stuff and
15 turn up the ports after we connected them, right. And
16 you had to be familiar with Cisco IOS. And I had a
17 CCNA certification, right.

18 So as it pertained to Cisco IOS, I pretty
19 much knew the commands, right, that you needed. There
20 was like probably three or four commands that you
21 needed to know to be able to troubleshoot a device
22 properly there from a connectivity standpoint.

23 So that's why I'm assuming he could have
24 wrote that.

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1 Q. Did everyone else on in your group have a
2 CCNA?

3 A. Chris did, if I'm not mistaken.
4 Other than that, not that I was aware of.

5 Q. Was there any opportunity when you were in
6 this group, that you were dealing with some of the
7 engineers in global engineering?

8 MS. WALSH: Objection to the form.

9 THE WITNESS: Strictly from a
10 connectivity standpoint, I mean, what cabling
11 they needed.

12 So they would engage us to, like, gauge
13 how many cables they needed, port capacity, make
14 sure all the cabling infrastructure -- excuse me
15 -- make sure all the cabling infrastructure was
16 in place for work, whatever it was.

17 From a cabling perspective, we pretty
18 much supported the entire building, right. So we
19 would offer support from that perspective.

20 BY MS. BOUCHARD:

21 Q. What others in your group in 2003 had your
22 knowledge of networking?

23 A. As it pertained to our job? Everybody.

24 Q. No. I'm asking your level of networking.

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1 It started while I was with the network integration
2 group. And it continued while I was with network
3 engineering.

4 I mean, you don't realize how much -- how --
5 the level of detail, right, that they were -- you don't
6 realize -- okay.

7 Since we were being audited, right, they want
8 to look at every step of everything that we did. So a
9 ticket came in, you know, how was it routed, who dealt
10 with it, so on and so forth, right.

11 So what they wanted from us was best
12 practices on how we performed our support operations,
13 right.

14 And when you put that on paper, you know,
15 essentially that was what I was asked to do.

16 Q. You're talking about 2003?

17 A. I did it while I was in Tommy's group, yeah.
18 I helped maintain the PCM too.

19 Q. The Process and Control Manual?

20 A. Yeah.

21 Q. So you helped maintain the Process and
22 Control Manual when you worked for Tom's group?

23 A. Yes.

24 Q. What was involved with maintaining that

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1 manual?

2 A. Pretty much mapping the different systems
3 that we used. Like, for instance, we used several
4 different trouble ticketing systems while I was at
5 Citigroup, right.

6 So initially, I think it was like GPMS. So
7 then there was GPMS, then there was -- I forgot what
8 the last trouble ticketing system, but there was
9 another trouble ticketing system.

10 Every time they changed the trouble ticketing
11 system, we would go in and pretty much review the
12 manual.

13 It was like a training manual. So you would
14 go in and review the manual and, like, step people
15 through the procedure that you would use to answer --
16 like, to respond to a ticket, right.

17 Q. So modifying the procedures as the procedures
18 changed, you would input that into the manual?

19 A. We were trained in the systems.

20 After we were trained in the systems, they
21 needed to be included in the PCM.

22 Q. What about when you were in global
23 engineering?

24 Did you have responsibility for creating the

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1 manuals there?

2 A. It was forced on me, yeah.

3 Q. Can you describe what those responsibilities
4 were?

5 A. They had a framework -- being that I was
6 familiar with the whole PCM thing because I was helping
7 maintain it for Tommy's group as far as our procedures
8 are concerned, they had a whole framework of things
9 that needed to be answered.

10 So they asked me to pretty much put what I
11 did to support the lab on paper, in regards to like
12 receiving equipment, inventorying equipment, right,
13 installing equipment, getting equipment on the network,
14 so on and so forth, because there was a whole set of
15 compliance issues that needed to be met.

16 So they asked me to put my procedures on
17 paper in light of, you know, what needed to be achieved
18 and just to make sure -- and possibly change the way we
19 did things, you know, if for some reason it didn't add
20 to any of the -- of like the audit framework that they
21 had going on.

22 Q. Is the correct name a lab user guide?

23 A. No. It was more of like -- like a training
24 manual for people that were going to be performing the

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1 job, right, as far as like what they needed -- the
2 minimum amount of things they needed to do in light of
3 our audit requirements, right.

4 It was an audit tool, really.

5 Q. So if the consultant had been hired full
6 time, that would have been a tool that they could have
7 used?

8 A. It would have helped them, but it was more
9 audit centric than anything.

10 I mean, the actual -- like the job steps
11 weren't necessarily completely included in there.

12 It would have helped, but it would have given
13 them an understanding of what they needed to know as
14 far as like audit concerns.

15 I don't think that they took it in context.
16 It would have helped. A little bit of both.

17 Q. So it was a manual for training in auditing?

18 MS. WALSH: Objection to the form.

19 Go ahead.

20 THE WITNESS: You can't necessarily
21 say that. Like they weren't too sure about where
22 they wanted to take it, right. And I really
23 wasn't too concerned.

24 Some people like, for instance, Tommy

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1 tried to maintain his manual from a standpoint
2 where it was a run book for newly hired
3 employees, right.

4 And he would meticulously document all
5 the procedures, right, that we did on a
6 day-to-day basis within his PCM, right.

7 BY MS. BOUCHARD:

8 Q. So that's what Tommy wanted you to put down
9 in the PCM?

10 A. He pretty much told me like after we -- if a
11 new system came in, he would tell me what he wanted,
12 what procedure he wanted me to do screen captures for
13 and put into the PCM as far as like answering a ticket
14 was concerned.

15 Q. Now, going back to when you worked for Tom,
16 where did he sit in relation to you?

17 A. Initially, he sat down a couple of desks away
18 from us. And then eventually he moved down to
19 125 Broad Street.

20 Q. When did he move to a different building?

21 A. I don't recall.

22 Q. You don't remember?

23 A. I don't recall.

24 Q. How would you communicate with him, by

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1 Is that called "a restack," or is that
2 something else?

3 A. The restack was a series of moves that took
4 place.

5 Q. So a restack is when you're moving a series
6 of computers to a different network?

7 I don't want to misstate it.

8 A. All right. What the restacks -- I mean, the
9 familiarity I have with the term, right, and the
10 restacks I can recall, was that Citigroup was trying to
11 expand the amount of people and the amount of network
12 connections that they could have on a particular set of
13 floors, right.

14 So they had 200 desks on this floor. Now,
15 they wanted to have 250 desks on this floor.

16 That means that they needed to change all the
17 furniture, right. And after they changed all the
18 furniture and created these 250 desks, they needed to
19 run connections, right, network cable connections into
20 the closet, right.

21 And then when they were done, the computers
22 would be deployed, right. And after the computers were
23 deployed, we would come through and take care of the
24 network cabling because now it was 250 connections as

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1 opposed to the 200 connections that were existing.

2 Cable are brought into different places. We
3 would document what cables, what place, right. So in
4 the future, we can turn around and support these
5 network connections, right.

6 Q. In that restack, would there be a move to a
7 different network, or would they stay on the same
8 network?

9 A. It wasn't my concern. I mean, my concern was
10 connectivity, right. So the equipment was set up by
11 other people. Port capacity was accounted for by other
12 people. Everything was accounted for by other people.
13 We just needed to make sure we had enough cables.

14 And then when you went to every desk and you
15 tested out. We had a -- what's called a fluke, right,
16 which pretty much tested for network connectivity, if
17 the network connection came up.

18 Q. Why weren't electricians simply doing that?

19 A. Again, because --

20 MS. WALSH: I'm going to object.

21 It's asked and answered. But go ahead.

22 THE WITNESS: For the same reason
23 as before, right.

24 When you have a computer network in the

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1 Could you take time to review this, and then
2 we'll ask you some questions about it.

3 A. Sure.

4 Q. Have you taken the time to review this?

5 A. Sure.

6 Q. In the section titled, "Overall Performance
7 Summary," is that an accurate reflection of your
8 performance from January 1, 2005, to May 31, 2005?

9 A. To a certain extent, yeah.

10 I mean, the product development efforts -- I
11 was supporting them by installing equipment, right.

12 And the compliance related duties really was
13 stuff that was given to me because I was in a position
14 to provide like inventories, stuff of that nature,
15 putting procedures there for completing lab work,
16 right, on paper, so on and so forth.

17 Q. So when you talk about the compliance-related
18 activities, you're talking about the manual being one?

19 A. Yeah.

20 Q. Then you were in charge of inventory; is that
21 correct?

22 A. Yeah.

23 Q. Why did you need to create an inventory
24 tracking system?

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1 A. We were never able to put in an inventory
2 tracking system.

3 I mean, essentially, what we ended up doing
4 was we had a connectivity database which pretty much we
5 documented all of the devices that came into the lab
6 and needed to be installed in this connectivity
7 database. So that's preliminary what we managed.

8 And we ended up using that as a basis to
9 compile these insurance questionnaires, so on and so
10 forth. Because the assumption was that anything that
11 came into the lab would eventually be connected and
12 documented and so forth.

13 So that's why they had to do that there.

14 Q. So I just want to clarify.

15 The inventory was used as a basis to complete
16 an insurance questionnaire?

17 A. Correct.

18 Q. Did you complete the insurance questionnaire?

19 A. For 388 Greenwich, yeah, because it was --
20 essentially, what we submitted was our connectivity
21 database.

22 Q. So for 388 Greenwich, were you doing the
23 inventory for that area as well?

24 MS. WALSH: Objection to the form.

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1 Go ahead.

2 THE WITNESS: In '05, I mean,
3 depending on where we were.

4 If we were already in Warren, then it was
5 for the Warren facility. I did it for the local
6 facility where we were at.

7 When we were in 388, I did it for 388.

8 BY MS. BOUCHARD:

9 Q. Okay. Understood.

10 Then how much in terms of dollars was tracked
11 on the inventory?

12 MS. WALSH: Objection to the form.

13 THE WITNESS: For -- again, I don't
14 remember exact figures. I don't -- it was in the
15 millions, really.

16 BY MS. BOUCHARD:

17 Q. In the tens of millions?

18 A. Possibly.

19 Q. Would it have been in the hundreds of
20 millions?

21 A. No. Tens.

22 Q. So somewhere between ten and a hundred
23 million?

24 A. Ten, twenty.

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1 Q. Ten, twenty million?

2 A. Max. I think it was around 10 million.

3 Q. How often would the insurance questionnaire
4 need to be filled out?

5 A. Annually.

6 Q. Was the insurance questionnaire to understand
7 what they were insuring?

8 A. From my understanding, after the whole World
9 Trade Center thing, right, Seven World Trade, Citigroup
10 was in there, they lost X amount of dollars. So it was
11 for a similar type scenario, right.

12 If you were to lose a complete site, what
13 would it cost you to replace the equipment you had in
14 there.

15 Q. So that's why you needed a count by count, to
16 know exactly how many pieces of what you had at any
17 given time?

18 A. Um-hum.

19 Q. I know that's a real basic way of putting it,
20 but --

21 A. Essentially, that's what it was. I mean, we
22 would receive evaluation equipment from different
23 companies and stuff. So essentially since we didn't
24 own the assets, right, it wasn't necessarily captured

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1 A. I think the wording on that is misleading.
2 Really, I mean, if something needed to get done, we
3 would discuss how it was going to get done, right.

4 And if there wasn't sufficient time to do it,
5 we would like obviously come in and do it, right.

6 Q. So this is an inaccurate statement that
7 someone is commending you for your initiative, and you
8 don't believe that it's accurate?

9 MS. WALSH: Objection to the form.

10 THE WITNESS: No.

11 What I'm stating is that we were
12 understaffed, things needed to be done, right.

13 It was understood that if certain things
14 didn't get done, obviously there would be an
15 issue. It's like with anybody.

16 You're given a job deliverable, right,
17 and it's the expectation that you're going to try
18 your best to meet it, right.

19 BY MS. BOUCHARD:

20 Q. Right. You act like a professional and you
21 make sure it gets done?

22 A. Yeah.

23 So you're assuming, right, that I'm not being
24 asked. I mean, obviously, I am being asked because the

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1 Q. What's been marked as Exhibit 9 is a pay
2 period record from the last pay period in 2006. And it
3 reflects that your total wages to date were \$74,448.58.

4 Do you see that?

5 That's at the Total column.

6 A. Yeah.

7 Q. It states your employer -- it's in sort of
8 the middle piece of the page.

9 Do you see that?

10 A. Yeah.

11 Q. It says, Citigroup Technology, Inc.?

12 A. Yeah.

13 Q. Your regular wages were about \$2,500 per
14 week; is that correct?

15 A. Yeah.

16 Q. Yes?

17 A. Yes.

18 Q. Or that might be pay period, I'm sorry, since
19 it's a two-week period.

20 I didn't mean to misrepresent that.

21 A. It was bi-monthly.

22 Q. Bi-monthly, okay.

23 (Whereupon, a discussion was held
24 off the record.)

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1 (Whereupon, Exhibit Millan-10 was
2 marked for identification.)

3 MS. WALSH: Were you asking him if
4 the figure reflected on the page was accurate, or
5 the question was whether his -- we might just
6 want to clarify that --

7 MS. BOUCHARD: Sure.

8 MS. WALSH: -- because you asked
9 him whether his weekly --

10 BY MS. BOUCHARD:

11 Q. Going back to Exhibit 9, you received a
12 salary, correct?

13 A. Yeah.

14 Q. It was a bi-monthly salary of about \$2,500?

15 A. Yes.

16 (Whereupon, a discussion was held
17 off the record.)

18 BY MS. BOUCHARD:

19 Q. Mr. Millan, this is a pay record from the
20 last pay period in 2001, okay.

21 So this reflects your earnings through the
22 year in 2001, if you agree. And it says earnings were
23 \$45,881?

24 Do you see that in the bottom --

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1 Q. They were the best practices?

2 A. They were supposed to be the best practices,
3 yes.

4 Q. That's why they're called "best," right?

5 MS. WALSH: Objection.

6 THE WITNESS: I guess.

7 BY MS. BOUCHARD:

8 Q. I understood from your previous testimony,
9 though, that you were asked to create the first draft.

10 MS. WALSH: Objection.

11 THE WITNESS: I worked on the
12 Process Control Manual based on, like,
13 information I was given from different sources,
14 right.

15 BY MS. BOUCHARD:

16 Q. So you compiled it based on various people
17 giving you some input?

18 A. I'm pretty sure I was given the template,
19 right.

20 And then I was told what procedures in
21 regards to like my lab functions, right, my lab support
22 functions mapped to this, right.

23 So, for instance, like asset tracking, right,
24 if I'm receiving the equipment and I'm keeping track of

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1 the equipment and I'm installing the equipment, right,
2 how does what I do relate to the asset tracking?

3 Q. So you wrote down those procedures as they
4 related to you?

5 A. As they related to the lab or as they related
6 to how it should be done. I don't remember the scope
7 of this particular document.

8 At the time we were having conversations
9 about, right, how is it that we actually do this,
10 right, and how is it that it's supposed to be done
11 first to be compliant.

12 So various people had input into, you know,
13 what the risks for the Citigroup, what the risks were
14 within the lab environment, so on and so forth.

15 Q. So when it says, "key job responsibilities,"
16 and it says, "oversight of control processes and
17 procedures for the CTI GE lab" --

18 MS. WALSH: What are you referring
19 to?

20 BY MS. BOUCHARD:

21 Q. I'm referring to your year-end Performance
22 Review. Section 1.

23 MS. WALSH: Which exhibit?

24 BY MS. BOUCHARD:

DEPOSITION EXHIBIT 1

CARMELO MILLAN

CARMELO MILLAN 9012 Bergenwood Ave. North Bergen, NJ 07047
e-mail: cmillan1@optonline.net home: 201-430-6928

SUMMARY

Well rounded technology enthusiast looking for interesting opportunities that will enhance my current skill set and allow me to provide quality technology support to the worlds evolving technology movements.

HIGHLIGHTS OF QUALIFICATIONS

- Capable of providing all around technology support, design, implementation, and troubleshooting for Small Office, Home Office, Enterprise, LAN, WAN, Server, and Workstation
- Solid experience configuring a large variety of software and hardware
- Excellent PC, network, hardware, and analytical troubleshooting skills
- Design, Install, configure routed LAN/WAN networks
- Proficient with Cisco IOS, UNIX, Windows 9x, NT, 2000, XP, and DOS
- Thorough understanding of the Seven Layer OSI Model and what protocols operate at what layers
- Solid understanding of TCP/IP filtering via Firewalls & ACL's to maximize network security
- Good understanding of Windows vulnerabilities and how to harden the OS and network for maximum security
- Excellent Microsoft Office/Visio productivity skills
- Heavy Cisco 6500 Layer 3 10/100/1000 switched LAN environment experience

PROFESSIONAL EXPERIENCE

07/07-Current **Self-Employed, Technology Consultant - North Bergen, NJ**

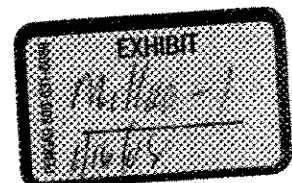
Self-Employed Technology Consultant providing technology services on a per project basis.

Recent Projects include:

National Amusement- Fandango Rollout

Papyrus Stationary- POS Rollout

Cara Accessories- horizontal cabling and cable abatement



engineers, teams, internal staff, business units and vendors

06/00 - 01/03 SalomonSmithBarney – Network Integration, Network Analyst – New York, NY

- Handle Help Desk calls regarding network & network connectivity issues as well as application issues.
- Handle the network connectivity and software checkout aspect of Moves, Adds, and Changes to the company network.
- Conduct proactive internal/external escalation, trouble ticketing, and reporting for 38 floors in a mixed DHCP/static, 10/100 switched Ethernet, gigabit backbone environment.
- Rack/Stack, troubleshoot, test, and support 2500, 2600, 4000, 7500, & 8500 series routers and 5500, 6500 series switches in production and pre-production environment.
- Participated in installation and activation of all equipment in Data Center and Comm Closets.
- OC3, ISDN, T1/T3, Frame Relay, Analog circuit installation, extension, termination, & troubleshooting.
- Created & implemented Salt & Peppering schemes to provide desktop, server, and network redundancy
- Worked with Network Operations, Engineering, Integration, as well as company business units in diagnosing, troubleshooting, & resolving company wide network problems
- Tested different media types with different testing devices including but not limited to butt sets, fiber testers, Mod-Taps, and Fluke meters
- Responsible for creation, maintenance, and accuracy of all network connectivity related databases/worksheets

01/99 - 6/00 Data-Tele – Telecommunications Technician – New York, NY

- Responsible for installation of data/voice infrastructure
- Implemented & installed Fiber (MMF and SMF), UTP (Cat3, Cat5, and Cat5E), Coax, BNC connectors, Patch Panels (Fiber, BNC, and Copper), RJ-45 Jacks, RJ-11 Jacks, Tech Plates, Hatches, Equipment Racks and Cabinets, Ladder Rack, Conduit, and Splice Boots. Primarily in Star and Extended Star topologies, involving large Copper and Fiber risers
- Conducted Pre-installation surveys to help determine possible IDF and MDF candidates as well as media type, implementation routes, necessary splice points (if any)

- Conducted Post-installation surveys to verify end to end connectivity, specification compliance, and resolve any over-looked problems

01/97 – 01/99 ACS – Field Technician – Hoboken, NJ

- Installed Peer to Peer and Client/Server Networks using Windows
- Performed service calls to small and medium sized businesses regarding general PC and networking problems
- Built and configured PC's to customer Specifications
- Provided and implemented technology based solutions to customer problems

EDUCATION

1993-1994 Rutgers University Newark, NJ
Pursued Bachelors in Computer Science

Former CCNA, completed the CCNP, A+, Network+, Security+ curriculums but did not take exams due to training budget issues at Citigroup.

LANGUAGE

Speak, read, and write Spanish Fluently.